

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

UBIQUITI INC., f/k/a Ubiquiti Networks,  
Inc.,

*Plaintiff,*

v.

CAMBIUM NETWORKS, INC.;  
CAMBIUM NETWORKS, LTD.; BLIP  
NETWORKS, LLC; WINNCOM  
TECHNOLOGIES, INC.; SAKID  
AHMED; and DMITRY MOISEEV

*Defendants.*

Civil Action No.: 1:18-cv-05369

JURY TRIAL DEMANDED

Hon. J. Gary S. Feinerman

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 26.2 and the Agreed Confidentiality Order entered in this case (Dkt. No. 102, as modified in Dkt. No. 154, collectively the “Protective Order”), Plaintiff Ubiquiti, Inc. (“Plaintiff”), by and through its undersigned counsel, respectfully requests that the Court grant Plaintiff’s Motion for Leave to File Under Seal (the “Motion”) an unredacted version of the brief and copies of Exhibits A, B, C & D attached to Plaintiff’s Reply in Support of Plaintiff’s Motion to Compel De-Designation of Defendants’ Attorneys’ Eyes Only Production and for Sanctions (“Reply”).<sup>1</sup> In support of the Motion, Plaintiff states as follows:

WHEREAS, the documents to be attached as Exhibits A, B, C & D to the Reply each contain documents that have been produced by Defendants in this action with confidentiality designations of “CONFIDENTIAL RESTRICTED – ATTORNEYS’ EYES ONLY” or

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<sup>1</sup> Pursuant to the terms of the Fourth Amended General Order In Re: Coronavirus COVID-19 Public Emergency (Dkt. No. 131), Plaintiff has noticed this motion for presentment at the earliest available date of July 15, 2020 – which date may be further subject to any individual orders entered by this Court with respect to the scheduling of such presentment hearings.

“OUTSIDE ATTORNEYS’ EYES ONLY – CONFIDENTIAL SOURCE CODE” under the Protective Order.

WHEREAS, certain sections of the Reply brief contain descriptions of the contents of documents that have been produced by Defendants in this action with confidentiality designations of “CONFIDENTIAL RESTRICTED – ATTORNEYS’ EYES ONLY” or “OUTSIDE ATTORNEYS’ EYES ONLY – CONFIDENTIAL SOURCE CODE” under the Protective Order, which sections Plaintiff has redacted from the publicly filed version of the Reply.

WHEREAS, Plaintiff seeks to file the above-referenced documents under seal in accordance with the terms of the Protective Order pending the Court’s ruling on its Motion to Compel De-Designation of Defendants’ Attorneys’ Eyes Only Production and for Sanctions.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that the Court grant leave to file the above listed documents and an unredacted version of its Reply brief under seal.

Dated: June 8, 2020

Respectfully submitted by:

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/s/ Erik J. Ives

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on June 8, 2020, he caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which is also served upon counsel for all parties of record.

/s/ Erik J. Ives  
Erik J. Ives